

Exhibit 17

From: [Andrew Domingoes](#)
To: [Sullivan, Brady M.](#); [Jason Johnson](#)
Cc: [SM: Min Cho](#); [Tucker Byrd](#); [Korn, Jeffrey](#); [Gottlieb, Michael](#); [Keevil, Pia Williams](#); [Debora Antisdal](#)
Subject: RE: Interamerican/PDVUSA- discovery call
Date: Thursday, July 21, 2022 9:43:44 AM
Attachments: [image001.png](#)
[image002.png](#)

*** **EXTERNAL EMAIL** ***

Brady,

As discussed, here is a brief table identifying the Raul Gorrin messages we discussed during our call on Monday.

	Message Time and Date	Bates Label	Description
1.	02/20/2017 07:48:31	Interamerican_003075	Communication with Raul Gorrin
2.	05/24/2017 10:36	Interamerican_003071	Communication with Raul Gorrin
3.	07/22/2017 22:00:16	Interamerican_003069	Communication with Raul Gorrin
4.	10/06/2017 11:56:53	Interamerican_0013569	Communication with Raul Gorrin
5.	12/17/2017 20:52:07	Interamerican_002569	Communication with Raul Gorrin
6.	08/14/2017 20:25:57	Interamerican_003068	Communication with Raul Gorrin
7.	04/06/2018 11:09:15	Interamerican_003064	Communication with Raul Gorrin
8.	04/09/2018 19:19:08	Interamerican_003063	Communication with Raul Gorrin
9.	04/10/2018 10:18:57	Interamerican_003063	Communication with Raul Gorrin
10.	02/12/2019 11:57:41	Interamerican_002992	Communication with Raul Gorrin

Please let me know if you have any questions.

Best,

Andrew

From: Sullivan, Brady M. <BSullivan@willkie.com>
Sent: Tuesday, July 19, 2022 7:47 PM
To: Andrew Domingoes <ADomingoes@ByrdCampbell.com>; Jason Johnson

<JJohnson@ByrdCampbell.com>

Cc: SM: Min Cho <mcho@ByrdCampbell.com>; Tucker Byrd <tbyrd@ByrdCampbell.com>; Korn, Jeffrey <JKorn@willkie.com>; Gottlieb, Michael <MGottlieb@willkie.com>; Keevil, Pia Williams <pkeevil@willkie.com>; Debora Antisdel <dantisdel@ByrdCampbell.com>

Subject: RE: Interamerican/PDVUSA- discovery call

Andrew,

I am writing to memorialize our call yesterday and our understanding of the WhatsApp productions. If any of the below is inaccurate, please let us know.

The subject of our call was the various WhatsApp message productions from Interamerican that do not contain any information denoting the sender or receiver of the messages (i.e., to/from information), and otherwise have no metadata. These include a two page PDF beginning Interamerican_003063, a 22 page PDF beginning Interamerican_002569, and a 1 page PDF stamped Interamerican_0013569. These PDFs contain only the body text of the messages and a date/time stamp.

You explained that when you first extracted data from Mr. Rivera's phone in January 2022, the WhatsApp messages extracted without any to/from information or other metadata. At the time, although to/from information and metadata for WhatsApp messages was available from your client's phone, the vendor failed to collect or process that information. The only information that extracted was the date of the message, and the body text. Those extracted messages included the messages contained in the three PDFs set forth above.

Thereafter, Interamerican retained another document vendor, who you described as having more experience with mobile device collections. This new vendor took a "clone" forensic image of Mr. Rivera's phone. Using that image, Interamerican was able to produce to PDV USA over 18,000 WhatsApp messages, all of which contain to/from information as well as celebrity metadata. However, the WhatsApp messages in the three PDFs set forth above are not in that production, and they no longer exist on your client's phone. Accordingly, Interamerican is unable to produce these particular messages in a format that shows to/from information or with metadata.

I asked if your client deleted these messages, and you responded that we should ask Mr. Rivera at deposition.

You also stated that, although some of the messages in question are communications involving Mr. Gorrín (including all of the communications with Mr. Gorrín contained on your prior privilege logs), you do not know whether the messages include communications with others, and you are not able to identify who is messaging who with respect to each message.

As I mentioned, PDV USA reserves all rights.

Regards,
Brady